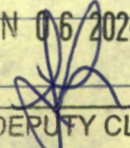


FILED
HARRISBURG, PA

JUN 06 2024

PER 
DEPUTY CLERK

United States District Court
Middle District of Pennsylvania

Erica rose Vought
v. Plaintiff

No. 3:22-CV-1448

Chris brighton
defendant

magistrate Judge Schwab

I Erica rose Vought hereby submit to the following
Court: Follow up Brief for Summary Judgement.

Erica rose Vought Prose Counsel Submit in this
Brief Some factual Dispute to Kelleher's Brief
and why Judgement should be in the plaintiffs favor

on August 19, 2019 The Defendant Traveled To
The plaintiff looking for a suspect who he knew then
Did not reside There. The defendant Then learning on
August 19, 2019 He Needed Evidence From Plaintiffs
residence Should have accessed a warrant. Nor Did The
Plaintiff Give him access to residence. like he stated
he Traveled there "he states" to look for a Suspect.
There was No reason None To Search Plaintiffs Home.
While States are free to regulate, arrests however
they desire State restrictions do not alter the
Fourth amend ments Protections.

Bivens. 403 U.S. 394

The defendant Feels as though I did not file my claim in a Timely manor. Plaintiffs Claim WAS filed After her arrest it did not occur For 2 years. The statue of limitations for Causes of action that occur while plaintiff is in prisoned beginning at the time of there arrest. District of Columbia v. Tinker

Tolling Stops when plaintiff is released. From The moment the defendant Kelleher entered Plaintiffs home she was still free to leave. There for statue of limitations has not yet begun to run on Plaintiffs Claim.

Pearson v. Sec'y Dep't of Corr 775 F.3d 598

So as a result the defendants summary motion Judgment should not be granted.

Procedural History:

Plaintiffs Complaint Started out with 7 defendants on September 16, 2022

On June 30, 2023 Judge Schwab dismissed all defendants Except for the defendant Kelleher

Discovery Deadline was April 8, 2024

Now this reply Brief is To Kellehers motions of undisputed facts and summary judgement

Question:

1. Should Plaintiffs fourth amendment claim be granted

A: Yes

2. Should Plaintiffs fourth amendment claim be dismissed because the claim is alleged time barred?

A: No

ARGUMENT

Summary Judgement Should be granted for the plaintiff. There is genuine issue for trial. Vought has submitted evidence in her Summary Judgement motion, warrants that did not exist the date the search occurred. The statute of limitations in Pennsylvania vary under different circumstances. "1658" Time limitations on the commencement for "Acts of Congress" (a) (b) (1) (2) a private right of action claim that involves deceit, manipulation concerning law. Sec 3 (a) (4) may be brought no later than ① 2 years after discovery or 2 5 years after violation. The defendant did manipulate his entry into the residence knowing the suspect did not reside there, and gain access to seize evidence for another ongoing case. Gordon v. Howell Even though my minor child did not show and was diagnosed right away with mental

health issues from the incident, does not mean they don't exist. All that is required that the plaintiff have sufficient notice to place him on alert of the need to begin investigation. All 7 parties were notified *Gordon v. Lowell* 95 F. Supp 2d

Plaintiff has done her best to file all proper paper work to the best of her knowledge and ability with this I ask the defendant's motion be denied.

respect fully Submitted

Erica Vought

6-2-24

Via US Mail

Office of Attorney General
15th Floor Strawberry Square
Harrisburg, PA 17120

Christine C. Einerson

United States District Court
Middle District of Pennsylvania

Erica rose Vought
v. Plaintiff

Chris brighton
defendant

No. 3:22-CV-1448
Magistrate Judge Schwab

Certificate of Service

I Erica rose Vought hereby Certify that on 6-2-24
I Caused to be Served a true and Correct Copy
of the forgoing document titled: Follow up Brief
For Summary Judgement

v Erica Vought
6-2-24

Via us Mail
office of attorney General
15th Floor Strawberry Square
Harrisburg PA 17120

Christine C. Einerson

Smart Communications/PADOC

SCI-MUNCY

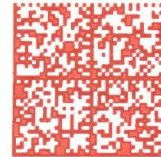
Name *Erica Vaughn*
Number *PE6795*

PO Box 33028

St Petersburg FL 33733

INMATE MAIL - PA
DEPT OF CORRECTIONS

FIRST-CLASS



US POSTAGESM PITNEY BOWES



ZIP 17756 \$ 000.64⁰
02 7W
0008033413 JUN 03 2024

RECEIVED
HARRISBURG, PA

JUN 06 2024

PER

DEPUTY CLERK

*Magistrate Judge Schwab
U.S District Court
Sylvia H. Rambo U.S Courthouse
1501 North 6th Street Suite 101*

1710281406 0024

